

## **IMPORTANT INFORMATION ABOUT INVESTMENT ADVICE FOR RETIREMENT ACCOUNTS**

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For more than 70 years, Fidelity Investments<sup>1</sup> has worked hard to earn the trust of our clients by serving and protecting their interests. We are dedicated to delivering great value and acting in your best interest when we make recommendations about investing for your retirement.

One way we do this is by being transparent about our services and costs. This includes making you aware of potential conflicts of interest that may arise when we provide investment advice, including compensation Fidelity and our financial professionals earn on the products and services you buy. We also want to make you aware of the limitations on investments and other options that we consider when providing investment advice for your retirement accounts.<sup>2</sup>

### **WHAT IS INVESTMENT ADVICE?**

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Our investment advice includes recommendations we provide with respect to how to invest your retirement account and whether you should roll your workplace plan account to another plan or IRA. Advice about how to invest your workplace retirement account may constitute investment advice as defined under the Employee Retirement Income Security Act of 1974, as amended (ERISA) and regulations thereunder.<sup>3</sup> However, other advice we provide may not be subject to ERISA's investment advice rules, including general descriptions and education about our products and services, assistance or information we may provide with respect to distribution or rollover decisions, and advice we provide for IRAs, Keogh plans, and plans that are not subject to ERISA.

Fidelity financial professionals are required to follow policies and procedures when providing investment advice, including using carefully designed investment methodologies, tools, or processes when providing investment advice under ERISA. In this way, we guard against potential conflicts affecting our commitment to give you advice that is in your best interest.

Our recommendations are intended to be acted on at the time they are provided. Unless we specifically agree otherwise in writing, it is your responsibility to monitor your investments and make changes if conditions warrant.<sup>4</sup>

### **WHAT DOES FIDELITY CONSIDER WHEN PROVIDING INVESTMENT ADVICE FOR WORKPLACE RETIREMENT ACCOUNTS?**

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When making recommendations to buy, sell, or exchange investments or to purchase investment advisory services for workplace retirement accounts, we will recommend only investment alternatives offered in the plan's fund lineup, including investment management services offered by a Fidelity affiliate, except Company stock, investments available only through Fidelity BrokerageLink®, annuities other than those primarily used for capital preservation, investment management or model portfolio services not managed by Fidelity, and investments that your employer may have directed us to exclude.

When providing assistance or information with respect to distributing or transferring your retirement assets, we consider only the options of staying in your existing plan, rolling over to another employer-sponsored plan recordkept by Fidelity, or rolling over to a Fidelity IRA. We do not assist with decision-making to roll over to plans or IRAs not recordkept by Fidelity, or to cash-out from a plan.

## WHAT DOES FIDELITY CONSIDER WHEN PROVIDING INVESTMENT ADVICE FOR IRAS AND KEOGH PLANS?

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When providing investment advice for IRAs and Keogh plans, we do not consider all possible investment options. We generally will recommend only mutual funds, exchange-traded funds (ETFs), certificates of deposit (CDs), investment-grade fixed income investments, U.S. Treasury securities, or annuity contracts. Fidelity may also recommend investment management services provided by Fidelity's Fidelity Personal and Workplace Advisors LLC.<sup>5</sup> Fidelity generally recommends only actively managed solutions, unless stated otherwise. You may also request or choose passively managed investments to the extent they are available. Options not considered for recommendations include individual stocks, mutual funds with transaction fees, non-Fidelity affiliated managed accounts or advisory services, and target date funds other than Fidelity's Freedom Funds.

## HOW ARE FIDELITY AND ITS FINANCIAL PROFESSIONALS COMPENSATED?

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The money Fidelity and our financial professionals earn varies based on your choice of products and services,<sup>6</sup> and how much you choose to invest or maintain at Fidelity. In general, the more you buy and invest, the more Fidelity earns. Variations in compensation to Fidelity and our financial professionals, based on your choice of products and services, create the potential for conflicts of interest.

Both Fidelity and our financial professionals generally earn more for investment management services than for individual investment products like mutual funds and other investment funds. In addition, Fidelity generally earns more on mutual funds and other individual investment products that it manages.

Please visit [www.fidelity.com/repcompensation](http://www.fidelity.com/repcompensation) for more information about compensation paid to our financial professionals.

<sup>1</sup>"Fidelity Investments" refers to Fidelity Brokerage Services LLC, Fidelity Personal and Workplace Advisors LLC, Strategic Advisers LLC, and their affiliates and subsidiaries.

<sup>2</sup>"Retirement accounts" herein refers to employer-sponsored plans, including 401(k) plans and 403(b) plans whether or not such plans are subject to Title I of ERISA, Individual Retirement Accounts and Keogh plans.

<sup>3</sup> Regulations under Section 3(21)(A)(ii) of ERISA generally define "investment advice" to include recommendations as to the advisability of investing in securities that is provided on a regular basis and pursuant to a mutual agreement or understanding that the recommendation will be individualized and will serve as a primary basis for investment decisions.

<sup>4</sup> Unless otherwise agreed to in writing, Fidelity will not monitor a recommendation on an ongoing basis. You should monitor your investments periodically and make changes if market conditions or your objectives, financial circumstances, risk tolerance, or investment needs change.

<sup>5</sup> Investment advisory services offered by Fidelity Personal and Workplace Advisors include discretionary investment management, financial and benefits planning and referrals to a third-party investment adviser through Fidelity's Wealth Advisory Services program. Investment advisory financial planning provided to retirement accounts does not include specific securities advice and clients are responsible for determining how to implement any financial planning recommendations, including asset allocation suggestions. Financial planning is educational in nature and should not be relied on as a primary basis for your decisions regarding investing in, purchasing or selling securities or other property for retirement accounts. In applying any asset allocation suggestion to your individual situation, be sure to consider other assets, income and investments (e.g., home equity, savings accounts or other retirement accounts) in addition to your retirement account(s).

<sup>6</sup> For 401(k) or other employer-sponsored plans, Fidelity may provide a credit to the plan, equal to all or a portion of the compensation received from investment products or services under the plan. This may reduce the amount of compensation to Fidelity and/or cause our compensation not to vary, based on your choice of products and services.

